

1 PHILLIP A. TALBERT  
2 United States Attorney  
3 JOSEPH D. BARTON  
4 HENRY Z. CARBAJAL III  
5 Assistant United States Attorneys  
2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
Telephone: (559) 497-4000  
Facsimile: (559) 497-4099

6  
7 Attorneys for Plaintiff  
United States of America

8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10  
11 UNITED STATES OF AMERICA,

CASE NO. 1:23-MJ-00136-SKO

12 Plaintiff,

13 v.  
14  
15 IRMA OLGUIN, JR.  
and JAKE SOBERAL  
16 Defendants.

**STIPULATION RE TREATMENT OF  
PROTECTED INFORMATION**

17

18 WHEREAS, the discovery in this case contains a large amount of other people's personal  
19 identifying information, including personal identification numbers, dates of birth, financial account  
20 numbers, telephone numbers, and residential addresses ("Protected Information"); and

21 WHEREAS, the parties desire to avoid the necessity of large-scale redactions and the  
22 unauthorized disclosure of Protected Information to anyone not a party to this case;

23 The parties agree that entry of a stipulated protective order is appropriate.

24 THEREFORE, the parties stipulate as follows:

25 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of  
26 Criminal Procedure and its general supervisory authority that pertains to all discovery produced to the  
27 defendants' counsel in this case;

2. By signing this stipulation, defense counsel agree not to share any discovery that contains Protected Information with anyone other than defense counsel and defense counsel investigators and support staff. Defense counsel may permit the defendants to review unredacted discovery that contains Protected Information in the presence of defense counsel or defense counsel investigators and support staff. But defense counsel shall not allow the defendants to copy the Protected Information and may only provide the defendants with copies of discovery from which the Protected Information is redacted;

3. The discovery may be used only in connection with the litigation of this case. The discovery is now and will remain the property of the government. Defense counsel will return the discovery to the government, or certify that it has been destroyed, at the conclusion of the case;

4. Defense counsel will store the discovery in a secure place and will use reasonable care to ensure that it is not disclosed to third persons in violation of this agreement; and

5. In the event that the defendants substitute counsel, undersigned defense counsel agree to withhold discovery from the new defense counsel until the new defense counsel agree to be bound by this stipulation and resulting order.

## IT IS SO STIPULATED.

DATED: December 6, 2023

/s/ Daniel Olmos  
Daniel Olmos  
Counsel for Irma Olguin, Jr.

DATED: December 6, 2023

/s/ Eric MacMichael  
Eric MacMichael  
Counsel for Jake Soberal

DATED: December 6, 2023

/s/ Joseph Barton  
Joseph Barton  
Henry Carbajal III  
Assistant United States Attorneys

1 PHILLIP A. TALBERT  
2 United States Attorney  
3 JOSEPH D. BARTON  
4 HENRY Z. CARBAJAL III  
5 Assistant United States Attorneys  
2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
Telephone: (559) 497-4000  
Facsimile: (559) 497-4099

6  
7 Attorneys for Plaintiff  
United States of America

8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10  
11 UNITED STATES OF AMERICA,

CASE NO. 1:23-MJ-00136-SKO

12 Plaintiff,

13 v.  
14  
15 IRMA OLGUIN, JR.  
and JAKE SOBERAL  
16 Defendants.

**ORDER RE TREATMENT OF PROTECTED  
INFORMATION**

17  
18  
19 For good cause shown, the stipulation between counsel, dated December 6, 2023, in *United*  
20 *States v. Irma Olguin, Jr., and Jake Soberal*, 1:23-mj-00136-SKO, regarding the treatment of protected  
21 information contained in the discovery, is approved.

22  
23 IT IS SO ORDERED.

24 Dated: December 7, 2023

/s/ Barbara A. McAuliffe

25  
26  
27  
28 UNITED STATES MAGISTRATE JUDGE